



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 05 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7679 6521
RETURN RECEIPT REQUESTED

Mr. Gene Yedica
Environmental/Process/Coatings Technician
Decorative Panels International, Inc.
2900 Hill Avenue
Toledo, Ohio 43607

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Decorative Panels International, Inc.
EPA I.D. No.: OHD080983935

Dear Mr. Yedica:

On January 15, 2014, representatives of the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency (Ohio EPA) inspected Decorative Panels International, Inc. (Decorative Panels), located at 2900 Hill Avenue in Toledo, Ohio. The purpose of the inspection was to evaluate Decorative Panels' compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste by a large quantity generator of such wastes. A copy of EPA's inspection report and checklists are enclosed for your reference.

Based on information provided by Decorative Panels' personnel, a review of records and personal observations by the inspectors, EPA finds that Decorative Panels is engaged in the management of hazardous waste without a hazardous waste storage permit, and is in violation of certain requirements of the United States Code of Federal Regulations (C.F.R.) and the Ohio Administrative Code (OAC). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, Decorative Panels must be in compliance with the conditions of OAC 3745-52-34(A), (B), and (C) [40 C.F.R. § 262.34(a), (b), and (c)]. Specifically, we find that Decorative Panels is in noncompliance with the following conditions for a storage permit exemption, and in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must ensure that facility personnel take part in an annual review of the initial hazardous waste training program and ensure that the training is documented. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-16(C) and (D)(4) [40 C.F.R. §§

265.16(c) and (d)(4)]. These are also requirements of owners and operators of hazardous waste storage facilities under OAC 3745-64-16(C) and (D)(4) [40 C.F.R. § 264.16(c) and (d)(4)].

During the inspection of records, there was no documentation provided that indicated RCRA hazardous waste refresher training had been given to the following employee who held a position involved with hazardous waste management: Steve Lodzinski was not trained in 2012. Decorative Panels, therefore, failed to comply with the above-referenced condition for a permit exemption and violated the above-referenced storage facility hazardous waste management procedures training program and documentation requirements.

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must ensure that whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under rule 3745-64-32 of the Administrative Code. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-34(A) [40 C.F.R. § 265.34(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-34(A) [40 C.F.R. § 264.34(a)].

During the inspection of the 90-Day Hazardous Waste Storage Building (West Building), the phone that was located directly outside of the 90-Day Hazardous Waste Storage Building was not working (no other working phone in the area) and there was no radio usage by employees in the area as stated by Mr. Yedica and Mr. Luffy. Decorative Panels, therefore, failed to comply with the above-referenced condition for a permit exemption and violated the storage facility preparedness and prevention requirements.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must ensure its contingency plan lists names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see OAC 3745-65-55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-52(D) [40 C.F.R. § 265.52(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-52(D) [40 C.F.R. § 264.52(d)].

Also, in order to avoid the need for a hazardous waste storage permit, a large quantity generator must ensure its contingency plan is reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-54(D) [40 C.F.R. § 265.54(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-54(A)(4) [40 C.F.R. § 264.54(d)].

During the inspection of records, the review of the contingency plan indicated that Mr. Yedica was listed as the facility's primary emergency coordinator and Timothy Boerst was listed as the secondary emergency coordinator. However, Mr. Yedica stated that Mr. Luffy is currently the secondary emergency coordinator, and the plan had not been revised. Decorative Panels, therefore, failed to comply with the above-referenced condition for a permit exemption and violated the storage facility contingency plan requirements.

4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator's contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-52(E) [40 C.F.R. § 265.52(e)]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-52(E) [40 C.F.R. § 264.52(e)].

During the inspection of records, the review of the contingency plan indicated that there were no locations described in the plan for the facility's decontamination equipment (eye wash stations) and there were no types and locations described in the plan for the facility's fire extinguishing equipment. Decorative Panels, therefore, failed to comply with the above-referenced condition for a permit exemption and violated the storage facility contingency plan requirements.

5. A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. See, OAC 3745-273-13(D)(1) [40 C.F.R. § 273.13(d)(1)].

Also, a small quantity handler of universal waste must ensure that each universal waste lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." See, OAC 3745-273-14(E) [40 C.F.R. § 273.14(e)].

During the inspection of the Store Room. There were four boxes that contained four-foot spent fluorescent bulbs and one box that contained eight-foot spent fluorescent bulbs. Also, there was one box that contained spent metal halide lamps. All six of these boxes were labeled as "Spent Lamps", and all six boxes were not closed. Decorative Panels, therefore, violated universal waste management requirements. However, during the inspection, an employee named Jim Burkhardt labeled all six boxes as "Used Lamps" and closed all six boxes that contained spent lamps. Pictures were taken to document these actions. Thus, no further actions are necessary for compliance with these requirements.

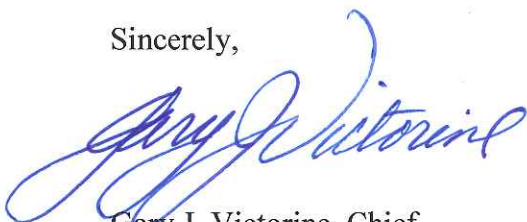
6. A large quantity generator who accumulates hazardous waste on-site for less than 90 days, and who does not meet the conditions for a storage permit exemption of OAC 3745-52-34(A), (B), and (C) [40 C.F.R. § 262.34(a), (b), and (c)], is an operator of a hazardous waste storage facility, and is required to apply for and obtain a hazardous waste storage permit. See, OAC 3745-50-40 to 3745-50-66; 3745-54 to 3745-57; 3745-205 and 3745-256 [40 C.F.R. Part 264, 40 C.F.R. §§ 270.1(c) and 270.10(a) and (d), and 270.13]. On failing to comply with the conditions for a permit exemption referenced in items 1-4 above, Decorative Panels became an operator of a hazardous waste storage facility, and was required to apply for and to obtain a hazardous waste storage permit. Decorative Panels did not apply for, or obtain, a hazardous waste storage permit. Decorative Panels' failure to apply for and to obtain a hazardous waste storage permit violated the permitting requirements of OAC rules 3745-50-41, par. (A); and 3745-50-45, par. (A) [40 C.F.R. §§ 270.1(c), 270.10(a) and (d), and 270.13].

At this time, EPA is not requiring Decorative Panels to apply for a storage permit, so long as it immediately establishes compliance with the conditions for an exemption as outlined above. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response no later than thirty (30) days after receipt of this letter to Bryan Gangwisch, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions or concerns regarding this letter, please contact Bryan Gangwisch, of my staff, at 312-886-0989.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael P. Luffy- Plant Manager – Decorative Panels
Mike.Luffy@decpanels.com

Melissa Boyers, Ohio EPA- NWDO
melissa.boyers@epa.ohio.gov

Bruce McCoy, Ohio EPA- CDO
bruce.mccoy@epa.ohio.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Decorative Panels International, Inc.

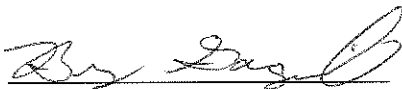
EPA ID No.: OHD080983935

ADDRESS: 2900 Hill Avenue
Toledo, OH 43607

DATE OF INSPECTION: January 15, 2014

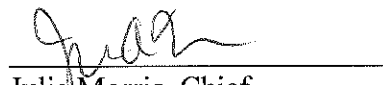
EPA INSPECTOR: Bryan Gangwisch

PREPARED BY:


Bryan Gangwisch
Environmental Scientist
Compliance Section #2

2/3/14
Date Completed

ACCEPTED BY:


Julie Morris, Chief
Compliance Section #2

2/6/14
Date

Purpose of Inspection

This inspection was an evaluation of Decorative Panels International, Inc. (Decorative Panels), and its compliance with hazardous waste regulations found at Ohio Administrative Code (OAC) and the Code of Federal Regulations (CFR). I performed the inspection with Melissa Boyers of the Ohio Environmental Protection Agency (Ohio EPA). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Michael P. Luffy, Plant Manager	Decorative Panels
Gene Yedica, Environmental/Process/Coatings Tech.	Decorative Panels
Bryan Gangwisch, Environmental Scientist	U.S. EPA
Melissa Boyers, Environmental Specialist II	Ohio EPA

Introduction

The inspectors arrived at the site on January 15, 2014, at approximately 9:17 a.m. The weather consisted of partly cloudy conditions with moderate wind, and an ambient air temperature of approximately 25 degrees Fahrenheit. As Mr. Luffy arrived in the reception area, we introduced ourselves, presented our inspector credentials and identification, and described the purpose of the inspection and the process by which we intended to conduct the inspection. The inspectors were led to a conference room. Mr. Luffy and Mr. Yedica provided us with a verbal description of the site, led the tour throughout the facility, and then attempted to provide us with the records we requested for review.

Site Description

During the opening conference Mr. Luffy and Mr. Yedica stated all of the following unless otherwise noted: The facility originally built in 1955, was owned and operated by Kroger Distribution until 1970 when Ford purchased the facility. In 1974, the facility had a cessation from Ford and was purchased by Abitibi until 1999. In 1999, Louisiana Pacific purchased and operated the facility until May 2004, when the operations were sold to Sun Capital (current owner) and operated by Decorative Panels. The facility manufactures coated, laminated, perforated and cut to size hardboard for retail and industrial use. The processes include roll and curtain coating, printing, drying and cooling. There are approximately 100,000 panels produced per week. There are approximately 75 total employees that work three shifts (Monday-Friday with Saturdays as needed).

Decorative Panels was operating as a large quantity generator (LQG) at the time of the inspection according to facility personnel and the facility's waste generation rate. There was one hazardous waste container storage area observed at the facility at the time of the inspection. There were satellite accumulation areas (SAA) observed at the time of the inspection.

The main waste streams that are regularly generated at the facility consist of: spent solvent flammable liquid waste; flammable solids waste; latex paint waste; water waste; spent aerosol cans; used oil dry/absorbent; and paint line cartridge filters. The hazardous waste codes associated with the main hazardous waste types that were generated at the facility consisted of: D001. There were no hazardous waste totes or tanks at the time of the inspection. There were spent fluorescent bulbs (Tradebe picks up for recycling) and batteries (Tradebe picks up for recycling) on-site during the inspection. Used oil and used antifreeze (Tradebe picks up for recycling) is also generated at the facility. The facility's generated electronic waste is also picked up by Tradebe for recycling. The facility generates solvent rags/shop towels that are sent for laundering/return to Brent Industries (Toledo, Ohio). The facility does not conduct any wastewater treatment activities. However, the facility does discharge industrial wastewater (V-stream ink wash water) to the City of Toledo. The sewer discharge is sampled monthly and monitored by the city. The facility also has a Title V air permit with Ohio EPA.

There were fire extinguishers, spill containment kits, decontamination equipment that were inspected and phones in place throughout the facility. There had been no spills or fires related to hazardous waste at the facility. The fire extinguishers are inspected monthly by Marine Fire Sales & Services. There are regular tours conducted at the facility by the Toledo Fire Department. There is an on-site guard twenty-four hours per day.

Site Tour

A physical walk-through of the facility was conducted at approximately 10:00 a.m. We started at the Fill Line area. There were four 55-gallon drums that contained product latex base coat paint as stated by Mr. Yedica. There was one 55-gallon drum that contained spent latex paint. The drum was labeled as "Non-Regulated Waste" and "Latex Paint." There was one 55-gallon container that contained shop towels to be sent for laundering/return as stated by Mr. Yedica. There were two 55-gallon drums that contained product sealer and one 55-gallon drum that contained product press room cleaner as stated by Mr. Yedica. There were eleven 250-gallon totes that contained product latex paint as stated by Mr. Yedica.

Still at the Fill Line area, there was one 55-gallon drum that contained waste roll paint filters. The drum was labeled as "Non-Regulated Waste", and was closed. There was one 250-gallon tote that contained waste ink wash. The tote was labeled as "Non-Hazardous Waste", "Non-Regulated Waste", and "Ink Wash." There were two 55-gallon drums that were labeled as "Non-Regulated Waste" and "Latex Paint", and were closed. There was one 30-gallon container that was labeled as "Non-RCRA Regulated" and "Latex Water Waste." There was spill containment equipment in this area. The facility's empty drums are sent to Lima Barrel and Drum for reconditioning as stated by Mr. Yedica.

Next, we inspected the Print Line. There were four 55-gallon drums that contained oil dry/absorbent material as stated by Mr. Yedica. There was one 55-gallon drum that was labeled as "Non-Regulated Waste" and "Latex Paint." There were approximately ten 55-gallon drums that contained product paint as stated by Mr. Yedica. There was one 55-gallon drum that contained product butyl acetate as stated by Mr. Yedica. There was one 55-gallon drum that

contained shop towels to be sent for laundering/return as stated by Mr. Yedica. The drum was labeled as "Soiled Shop Towels Only." There was one 55-gallon drum that contained product butyl acetate as stated by Mr. Yedica. There was one 55-gallon drum that contained bucket liners, paint cartridge filters and personal protective equipment (ppe) as stated by Mr. Yedica. The drum was labeled as "Non-Regulated Waste" and "Non-RCRA", and was closed.

At the Solvent Line, there were two separate SAA. The first SAA consisted of one 55-gallon drum, situated on a spill containment pallet, which was labeled as "Hazardous Waste" and "Waste Paint Related Material", and was closed. The other SAA consisted of one 55-gallon drum, which was labeled as "Hazardous Waste" and "Waste Flammable Solids", and was closed. There was one 55-gallon drum (closed) that contained product butyl acetate as stated by Mr. Yedica. There were approximately fifteen 55-gallon drums that contained product ink as stated by Mr. Yedica. There was an over pack drum, for spill containment purposes, in this area.

Next, we inspected the Bulk Tank Area. There was one 4,800-gallon non-hazardous waste tank that contained latex paint waste. The tank was labeled as "Non-Hazardous Waste" and "Waste Stream F." A picture was taken. There was another 4,800-gallon tank and an 8,000-gallon tank that were latex paint product tanks as stated by Mr. Yedica. Both tanks were empty at the time of the inspection, due to the facility changing its paint product/process vendor as stated by Mr. Yedica. All three tanks were situated inside of a concrete liner that provided secondary containment. A picture was taken.

At the Solvent-Based Bulk Tank Room, there were two 8,000-gallon product top-coat solvent tanks as stated by Mr. Yedica. The first tank contained white top-coat product solvent and the other tank contained clear top-coat product solvent as stated by Mr. Yedica. Both tanks were situated in a concrete vault that provided secondary containment.

Next, we inspected the Product Fill Line Area. There were approximately fifty 55-gallon drums that contained product latex paint as stated by Mr. Yedica. There was one 300-gallon tote that was labeled as "Non-Regulated Waste" and "Latex Paint."

At the Mix Room, there were containers of product latex paint as stated by Mr. Yedica. There was no waste in this area at the time of the inspection.

Next, we inspected the East Building. There were several 55-gallon drums and three 250-gallon totes that contained product water-based inks and product latex paint as stated by Mr. Yedica. There was spill containment equipment and an over pack drum (for spill containment purposes) in the building.

At the Print Room, there was one 250-gallon tote that was labeled as "Non-Regulated Waste" and "Ink Wash", and was closed. A picture was taken. This waste stream gets pumped to the larger non-hazardous waste bulk tank as stated by Mr. Yedica. There were four 250-gallon totes that were labeled as "Non-Regulated Waste." These four totes contained the V-stream waste ink wash that is discharged to the sewer that is monitored by the City of Toledo as stated by Mr.

Yedica. There was one 55-gallon drum that was labeled as "Non-Regulated Waste" and "Latex Paint", and was closed. There were approximately ten 55-gallon drums that contained product latex paint as stated by Mr. Yedica.

Next, we inspected the Mono-Coat area. The discharge point to the city sewer was observed (for the V-stream ink wash). A picture was taken.

At the Menards Line area, there was different product types in storage as stated by Mr. Yedica.

On the way to inspect the R&D area, there was a cubic-yard sack that contained cut out perforated hardboard pellets as stated by Mr. Yedica. These pellets are shipped (approximately twenty cubic-yard sacks per week) to another Decorative Panels facility in Alpena, Michigan, where they are burned via a regulated permit as stated by Mr. Yedica.

Next, we inspected the R&D area. There was no waste in this area at the time of the inspection.

At the Shipment Area, there was one 250-gallon tote (about ½ full and closed) that contained cleaned out sump waste that was pending waste characterization (conducted by Tradebe) as stated by Mr. Yedica. The sump in this area is cleaned out about once per year as stated by Mr. Yedica.

Next, we inspected the Maintenance area. There were two parts washers that are serviced (every three months) by Safety Kleen and are part of the Continued Use Program as stated by Mr. Yedica.

At the Fork Lift Room, there were two 55-gallon drums that were labeled as "Used Oil." There was one 55-gallon drum that was labeled as "Used Antifreeze." There was one 55-gallon drum that was labeled as "Used Oil Filters." There were some product lead acid batteries in this area as stated by a maintenance employee, and the spent lead acid batteries are sent to Car Quest as part of an exchange program as stated by the same employee in this area.

Next, we inspected the Store Room. There were four boxes that contained four-foot spent fluorescent bulbs and one box that contained eight-foot spent fluorescent bulbs. Also, there was one box that contained spent metal halide lamps. All six of these boxes were labeled as "Spent Lamps", and all six boxes were not closed. Pictures were taken. All six boxes were dated with accumulation start dates within one year with the oldest date being 9/26/13. During the inspection, an employee named Jim Burkhardt labeled all six boxes as "Used Lamps" and closed all six boxes that contained spent lamps. Pictures were taken to document these actions. There was one box and one 5-gallon pail that contained spent batteries. Both the box and the 5-gallon pail were labeled as "Used Batteries."

Adjacent to the Maintenance Shop, there was an SAA that consisted of one 55-gallon drum with an aerosol can crusher unit on top of it. The drum was labeled as "Hazardous Waste" and

“Puncture Used Aerosol Cans Here”, and was closed. The crushed metal aerosol cans are placed into the flammable solids hazardous waste stream as stated by Mr. Yedica.

Next, we inspected the 90-Day Hazardous Waste Storage Building (West Building). There was one 55-gallon drum, situated on a spill containment pallet, which was labeled as “Non-Regulated Waste” and “Paint Debris”, and was closed. There were two 55-gallon hazardous waste drums situated on a spill containment pallet. Both drums were labeled as “Hazardous Waste” and “Waste Paint Related Material”, one drum was dated 1/14/14 and the other drum was dated 1/8/14, and both drums were closed. There were several 55-gallon drums and 250-gallon totes that contained flammable product materials as stated by Mr. Yedica. There was an eye wash station, fire extinguisher, spill containment equipment, and aisle space was sufficient. The phone that was located directly outside of the 90-Day Hazardous Waste Storage Building was not working (no other working phone in the area) and there was no radio usage by employees in the area as stated by Mr. Yedica and Mr. Luffy.

Record Review

The review of records was conducted at approximately 12:00 p.m. The recent manifests show that all hazardous waste was sent to the following TSD(s): Tradebe Treatment & Recycling, LLC (IND000646943) and EQ Detroit, Inc., (MID980991566). The bulk non-hazardous latex paint waste (water waste) was also being sent to the following: Advanced Resource Recovery (MID057002602). The following transporters were also used: A.R. Paquette & Co. (FLD982105884), Thunderbird Trucking, LLC (INR000123497), EQ Industrial Services (MI0000263871), and Midwest Transport Group (MIK788363422). At least three years of manifests were retained on-site. All LDR notices were available for review for each waste stream. The most recent shipment for the spent bulbs and electronic waste was 10/30/13 and 12/20/13, respectively.

The facility’s hazardous waste report for 2012 was on file and was reviewed. Also, past hazardous waste reports were retained for at least three years.

Waste determinations were documented either through analysis/waste profile or generator knowledge and MSDS. The TCLP (Water Analysis Report # 2183) results, performed by City of Toledo Central Lab on 4/12/12, for the V-stream ink wash waste (discharged to sewer) was reviewed. The waste profiles for the following waste streams were also reviewed: latex paint, flammable solids, top-coat solvent (flammable paint liquids), oil dry/absorbent, used oil, water-based paint debris, and latex and water bulk.

The acceptable letter/e-mail dated May 9, 2012, from the City of Toledo regarding the V-stream ink wash waste discharge to the city sewer, was on-site and was reviewed.

The weekly inspections for the 90-Day Hazardous Waste Storage Building and the inspections of the emergency equipment at Decorative Panels were being conducted and were documented.

There was a contingency plan in place for the facility. The plan was titled "Emergency Response Contingency Plan", and was noted as being effective as of September 2005. Mr. Yedica was listed as the facility's primary emergency coordinator and Timothy Boerst was listed as the secondary emergency coordinator. However, Mr. Yedica stated that Mr. Luffy is currently the secondary emergency coordinator, and the plan had not been revised. Also, there were no locations described in the plan for the facility's decontamination equipment (eye wash stations) and there were no types and locations described in the plan for the facility's fire extinguishing equipment.

There was a RCRA hazardous waste management training program in place at the facility. The annual RCRA trainings are conducted at the facility by Black & White Technologies Company. The annual RCRA training curriculum and the sign-in sheets that documented that the RCRA trainings were received, were available and were reviewed by the inspectors. However, the training records indicated that Steve Lodzinski was not trained in 2012.

Closing Conference

We summarized the RCRA requirements for the following: contingency plan, annual RCRA training records (one employee) and documentation, universal waste management, preparedness and prevention (communication device at the 90-Day Hazardous Waste Storage Building) identified during the inspection. The inspection concluded at approximately 2:17 p.m.

Decorative Panels made no claim of confidential business information related to any pictures taken or documents received by U.S. EPA during the inspection.

Documents received during this inspection are as follows:

- Copy of facility's waste generation amounts (water, solvent, and flammable solids waste) for 2012 and 2013
- Copy of facility's Hazardous Waste Report for 2012

Documents given to Decorative Panels during or after this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- Ohio EPA Onsite Pollution Prevention Assistance handout

A photo log is attached consisting of fifteen (15) photos taken by U.S. EPA during the inspection.



1. A view, at the Bulk Tank Area, of one 4,800-gallon non-hazardous waste tank that contained latex paint waste. The tank was labeled as “Non-Hazardous Waste” and “Waste Stream F.”

Decorative Panels International, Inc., Toledo, OH
Bryan Gangwisch, U.S. EPA 1/15/14



2. A view, at the Bulk Tank Area, of the concrete liner that provided secondary containment for the same 4,800-gallon non-hazardous waste tank (as above in photo # 1) that contained latex paint waste.

Decorative Panels International, Inc., Toledo, OH
Bryan Gangwisch, U.S. EPA 1/15/14



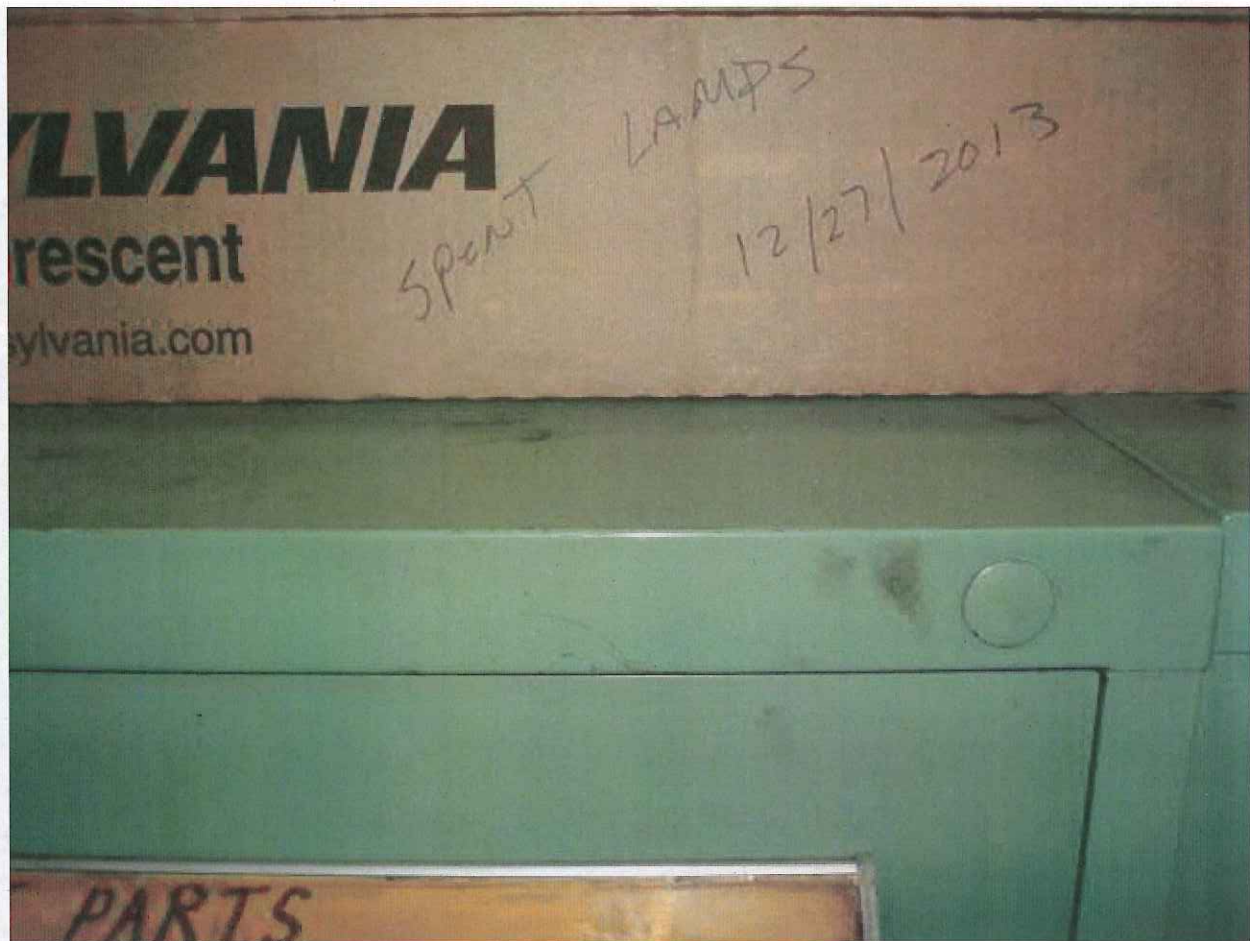
3. A view, at the Print Room, of one 250-gallon tote that was labeled as "Non-Regulated Waste" and "Ink Wash", and was closed.

Decorative Panels International, Inc., Toledo, OH
Bryan Gangwisch, U.S. EPA 1/15/14



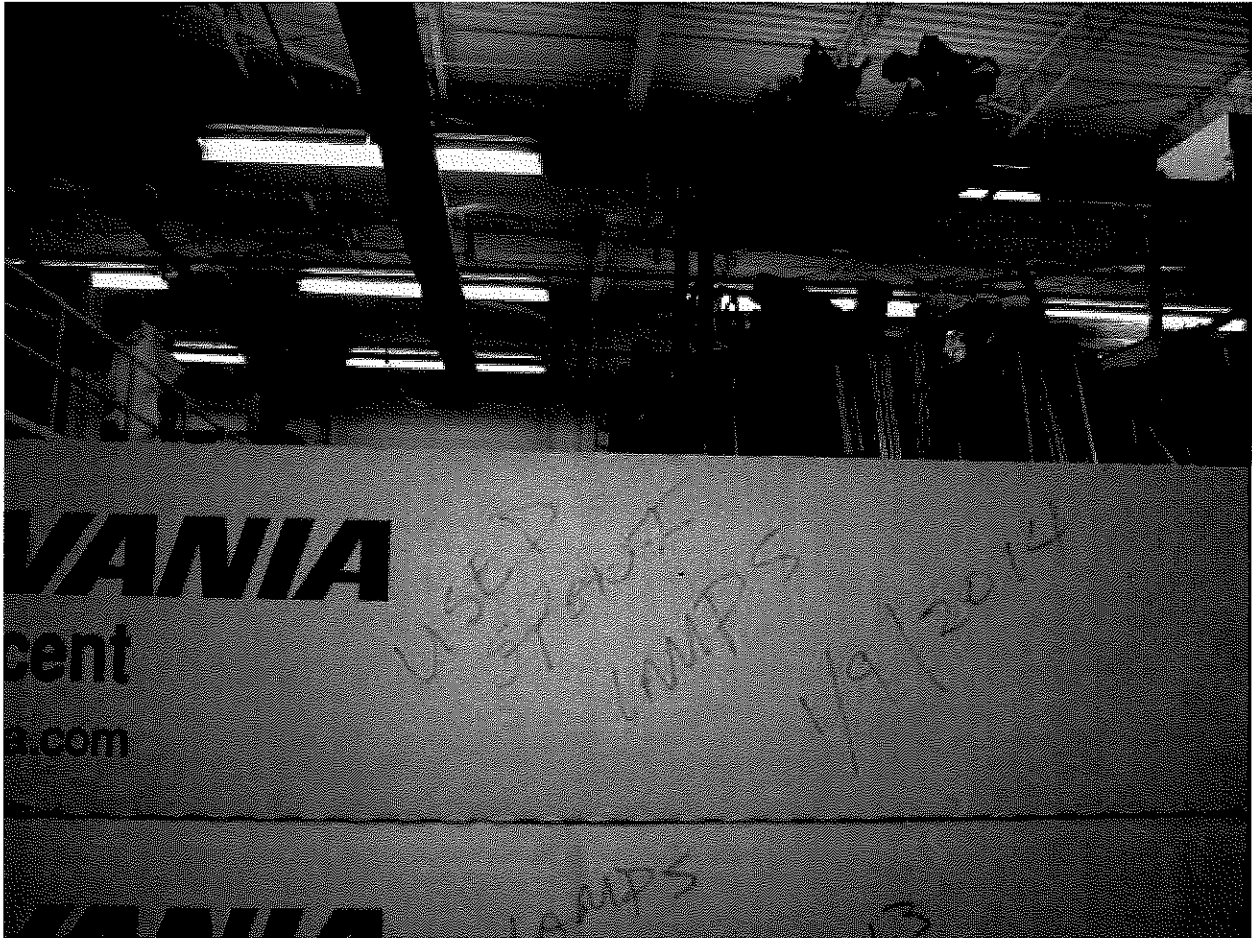
4. A view, at the Mono-Coat area, of the discharge point to the city sewer
(for the V-stream ink wash).

Decorative Panels International, Inc., Toledo, OH
Bryan Gangwisch, U.S. EPA 1/15/14



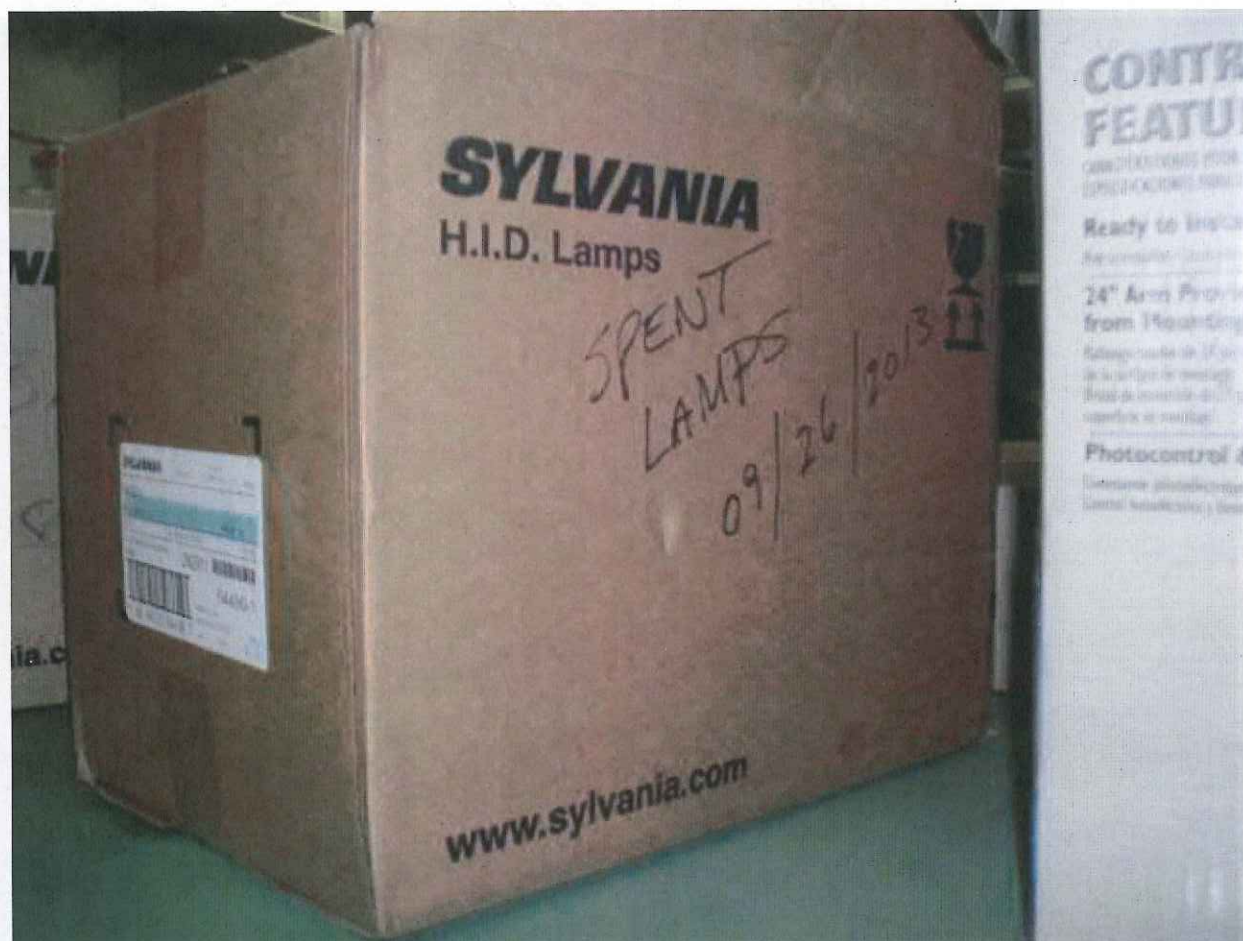
5. A view, at the Store Room, of a box that contained four-foot spent fluorescent bulbs and was labeled as "Spent Lamps", and was not closed.

Decorative Panels International, Inc., Toledo, OH
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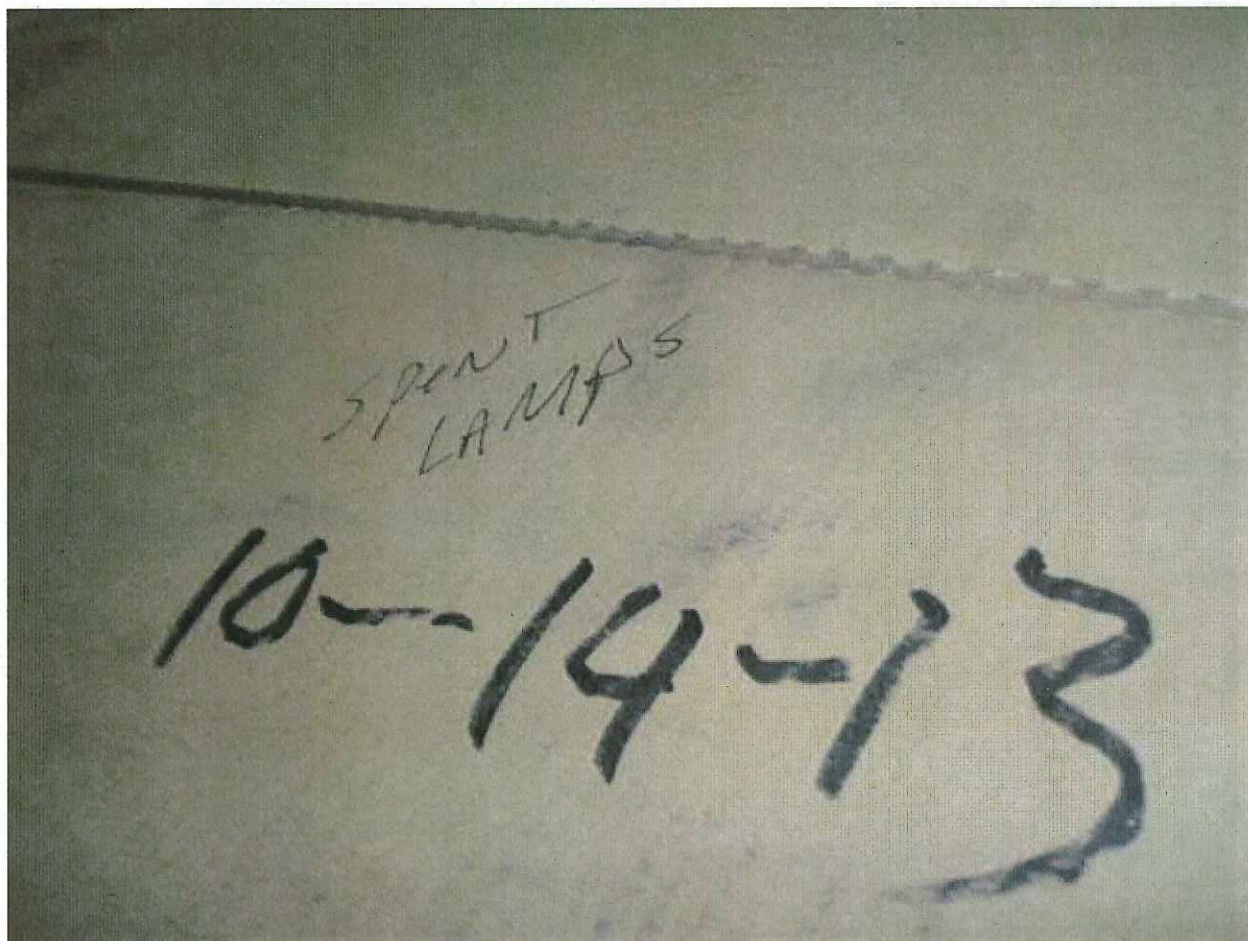
6. A view, at the Store Room, of a box that contained four-foot spent fluorescent bulbs and was labeled as "Spent Lamps", and was not closed. During the inspection, an employee named Jim Burkhardt labeled all six boxes as "Used Lamps" and closed all six boxes that contained spent lamps.

Decorative Panels International, Inc., Toledo, OH
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7. A view, at the Store Room, of one box that contained spent metal halide lamps. The box was labeled as "Spent Lamps", and was not closed.

Decorative Panels International, Inc., Toledo, OH
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8. Another view, at the Store Room, of boxes that contained four-foot spent fluorescent bulbs. The boxes were labeled as "Spent Lamps", and were not closed.

Decorative Panels International, Inc., Toledo, OH
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9. Another view, at the Store Room, of boxes that contained four-foot spent fluorescent bulbs. The boxes were labeled as "Spent Lamps", and were not closed.

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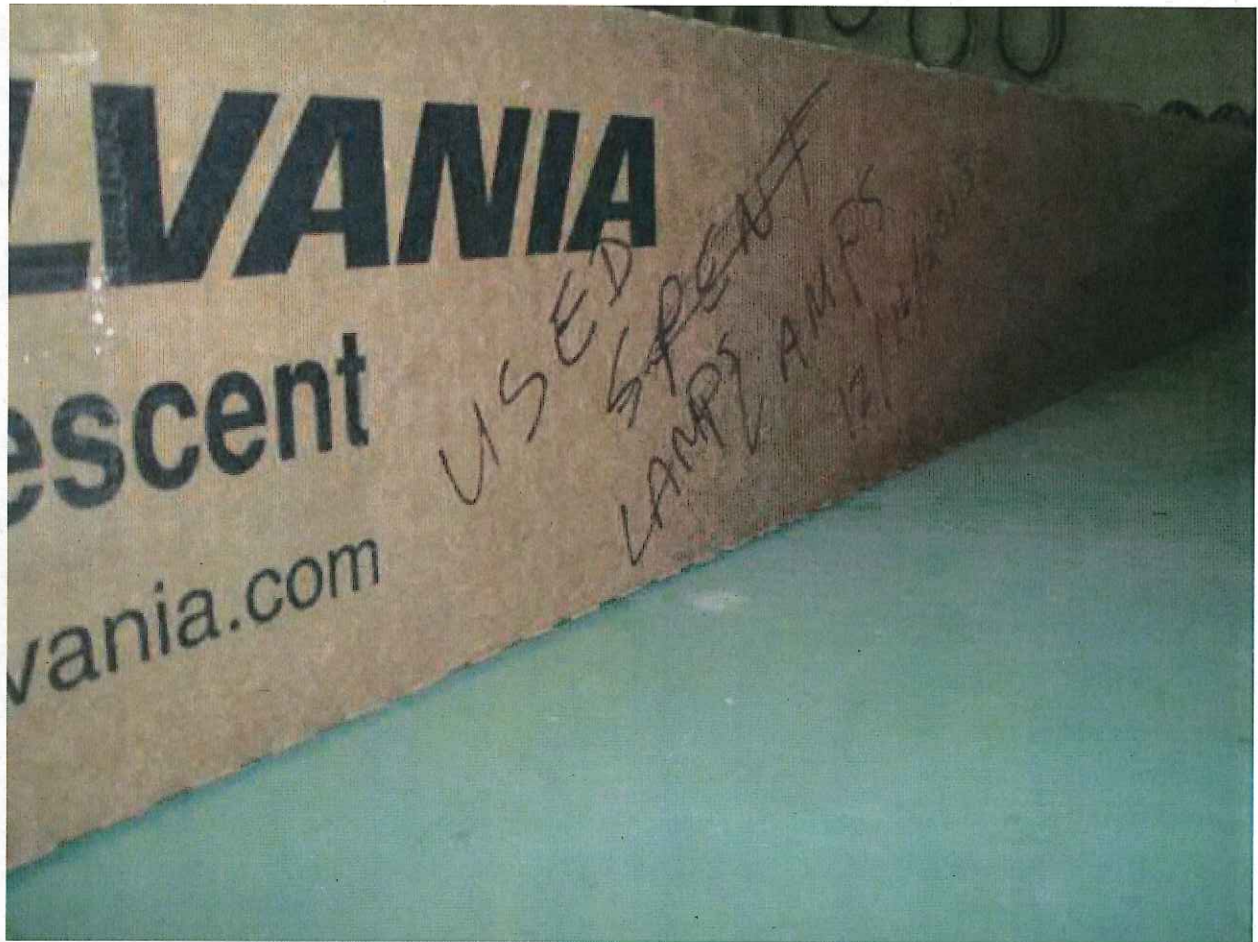
10. Another view, at the Store Room, of boxes that contained four-foot spent fluorescent bulbs. The boxes were labeled as "Spent Lamps", and were not closed.

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11. Another view, at the Store Room, of boxes that contained four-foot spent fluorescent bulbs. The boxes were labeled as "Spent Lamps", and were not closed.

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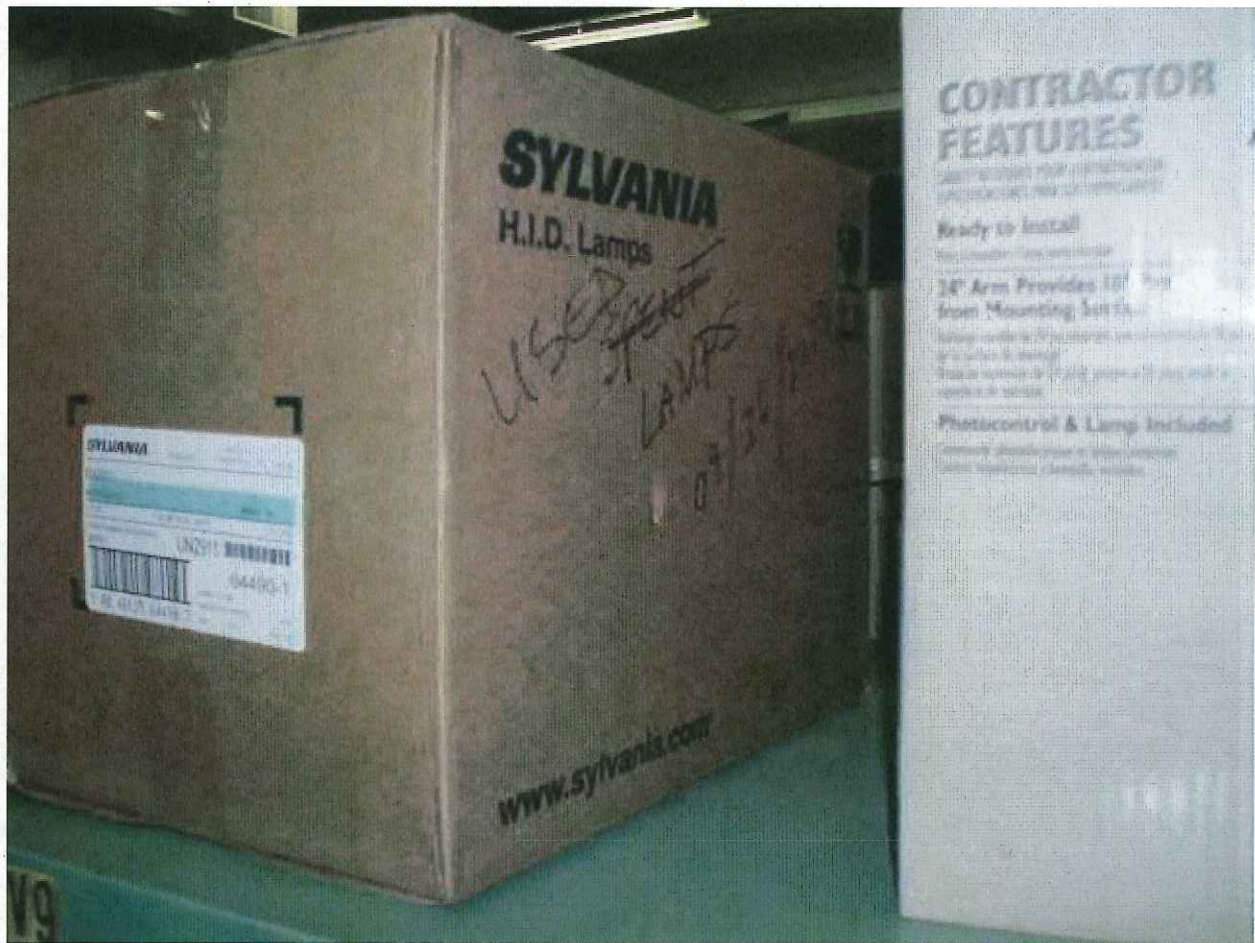
12. Another view, at the Store Room, of a box that contained four-foot spent fluorescent bulbs and was labeled as "Spent Lamps", and was not closed. During the inspection, an employee named Jim Burkhardt labeled all six boxes as "Used Lamps" and closed all six boxes that contained spent lamps.

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13. Another view, at the Store Room, of the same boxes closed up.

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14. Another view, at the Store Room, of the same box (as above in photo # 7) that contained spent metal halide lamps. The box was labeled as "Spent Lamps", and was not closed. During the inspection, an employee named Jim Burkhardt labeled all six boxes as "Used Lamps" and closed all six boxes that contained spent lamps

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15. Another view, at the Store Room, of the same boxes closed up.

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OHD 080 983 935

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were biennial reports filed with Ohio EPA by March 1 st of each even numbered year? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are biennial reports kept on file for at least 3 years after the due date of the report? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue, did the generator:	
a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]		
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide refresher training to employees during each period from January 1 st to December 31 st and does each training occur within 15 months after the previous training? [3745-65-16(C)] <i>employee</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16(D)(4)] <i>in 2012, 1 employee</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical fire ext, description and brief outline of capabilities? [3745-65-52(E)] <i>eye washer</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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31.	Has the generator revised the plan in response to rule changes, facility, equipment and <u>personnel changes</u> or failure of the plan? [3745-65-54]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Verify that the equipment is listed in the contingency plan.

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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SATELLITE ACCUMULATION AREA REQUIREMENTS		
43.	Does the generator ensure that satellite accumulation area(s):	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.</i></p>		
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS		
45.	Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: Record location on process summary sheets, photograph the area, and record on facility map.</i></p>		
48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.</i></p>		
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]</i></p>		
PRE-TRANSPORT REQUIREMENTS		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: Continue with the generator LDR requirements on the next page.</i></p>		

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Decorative Panels International, Inc.

GENERATOR LDR REQUIREMENTS

NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If "Yes" see question #16.

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
i.	Applicable HW codes?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a <u>new TSD</u> ? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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	[3745-270-07(A)(2)]		
a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
PROHIBITED DILUTION			
12.	Is the HW treated by burning? If "No" go to #15.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.			
14.	a. Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]		
	i. Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	ii. Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	iv. Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	v. Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	b. If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	

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a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If "Yes", HW is improperly being treated by dilution.		
b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].		
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.		

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Decorative Panels International, Inc. OHD080983935

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item #: 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO
Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable): <ol style="list-style-type: none"> 1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since. 2. The container capacity is less than .1 cubic meter (26 gallons) 3. A unit (e.g. tank) has stopped adding waste and is undergoing closure 4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program 5. The unit is used solely to manage radioactive mixed waste 6. The unit is regulated by and operates in accordance with Clean Air Act regulations *Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt				
CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO
General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable): <ol style="list-style-type: none"> 1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required) 2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes. 3. The unit is a tank used for certain biological treatment 4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics) 5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements 				
CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed
Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <u>not</u> needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.				

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CONTAINER MANAGEMENT 265.1087						
Level 1		Level 2		Level 3		
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service		Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)		Larger than 26.4 gallons and treat H.W. by a stabilization process		
CC-4	265.1087	Controls		NA	NI	OK
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)		One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)		-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)		

Level 1			Level 2		Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency			NA	NI	OK	DF	
CC -5	265.1087	Waste transfer requirements					<input checked="" type="radio"/>	
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)			Not applicable			
CC-6	265.1087	Operating requirements			NA	NI	<input checked="" type="radio"/>	DF
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)					-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements			<input checked="" type="radio"/>	NI	OK	DF
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)					Inspection requirements are the same as for tanks			
CC- 8	265.1087	Repair requirements			NA	NI	<input checked="" type="radio"/>	DF
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)					Necessary corrective measures shall be <u>immediately</u> implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	Recordkeeping requirements			<input checked="" type="radio"/>	NI	OK	DF
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept			Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

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Decorative Panels International, Inc. OHD080983935

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
PROHIBITIONS		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE PESTICIDES		
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

RCRA SMALL QUANTITY UNIVERSAL WASTE HANDLER INSPECTION CHECKLIST

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UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT		
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

UNIVERSAL WASTE LAMPS		
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? <u>Are containers or packages closed</u> and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.		
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
ACCUMULATION TIME		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: <i>Shipping papers/manifests demonstrates handling period & dates marked on boxes</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
EXPORTS					
35.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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Decorative Panels International, Inc. OHD080983935

USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS		
NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.		
PROHIBITIONS		
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: For example, used oil contaminated scrap metal stored in a pile.		
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).		
GENERATOR STANDARDS		
4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.		
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.		
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
ON-SITE BURNING IN SPACE HEATER		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	No
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.